

UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

KEISHA SUTTON,

Plaintiff,

Case No: 10-13918

Hon. Denise Page Hood

vs.

CHIMKO & ASSOCIATES, P.C.

Defendant,

Andrew L. Campbell (P64391)
Attorney for Plaintiff
653 S. Saginaw Street, Suite 201
Flint, MI 48502
(810) 232-4344

Michael O. Nelson (P23546)
Co-Counsel for Plaintiff
1104 Fuller NE
Grand Rapids, MI 49503
(810) 232-4344

COLLINS, EINHORN, FARRELL & ULANOFF
Michael J. Sullivan (P35599)
David C. Anderson (P55258)
Monika L. Sullivan (P69881)
Attorneys for Defendant
4000 Town Center, Suite 909
Southfield, MI 48075
(248)355-4141

OFFER OF JUDGMENT

TO: PLAINTIFF KEISHA SUTTON, through her attorneys, Andrew Campbell and Michael Nelson.

Pursuant to Fed. R. Civ. P. 68, Defendant Chimko & Associates, P.C., through its attorneys, Collins, Einhorn, Farrell & Ulanoff, P.C., hereby offers to allow judgment to be taken against it in this action in the amount of \$5,000.00 (with \$3,000 of the judgment allocated toward plaintiff's legal fees and the remaining \$2,000 allocated towards plaintiff's alleged damages), in favor of Plaintiff, Keisha Sutton, inclusive of all costs and interest to date. This Offer of Judgment is made for the purposes specified in Fed. R. Civ. P. 68 and is not to be construed as an admission of liability or as an admission that Plaintiff has suffered any damages.

In accordance with Fed. R. Civ. P. 68, this offer must be accepted in writing within 14 days after service.

COLLINS, EINHORN, FARRELL & ULANOFF, P. C.

BY: /s/ David C. Anderson
MICHAEL J. SULLIVAN (P35599)
DAVID C. ANDERSON (P55258)
MONIKA L. SULLIVAN (P69881)
Attorneys for Defendant
4000 Town Center, Suite 909
Southfield, MI 48075-1473
(248) 355-4141

Dated: February 18, 2011

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2011 my secretary, Susan Wagner, electronically filed this Offer of Judgment with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

BY: /s/ David C. Anderson
MICHAEL J. SULLIVAN (P35599)
DAVID C. ANDERSON (P55258)
MONIKA L. SULLIVAN (P69881)
Attorneys for Defendant
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Dated: February 18, 2011

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